



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

FEB 17 2016

**CERTIFIED MAIL 7009 1680 0000 7677 7827**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Mr. Robert Brennan  
Plant Manager  
Core Composites Cincinnati, LLC  
4174 Half Acre Road  
Batavia, Ohio 45103

Re: Notice of Violation  
Compliance Evaluation Inspection  
EPA ID: OHD052150703

Dear Mr. Brennan:

On December 16 – 17, 2015, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency inspected the Core Composites Cincinnati ("Core") facility located in Batavia, Ohio. As large quantity generator of hazardous waste, Core is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Core's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment, and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Core, EPA's review of records pertaining to Core, and the inspector's observations, EPA has determined that Core has unlawfully stored hazardous waste without a permit or interim status by failing to comply with certain conditions for a permit exemption under Ohio Admin. Code § 3745-52-34(A)-(C) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Core was out of compliance at the time of the inspection in paragraphs 1- 6, below.

A subset of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSDF requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSDF requirement. The exemption conditions identified in paragraphs 3-6 are also independent TSDF requirements incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256.

Accordingly, each failure of Core to comply with these conditions is also a violation of the corresponding requirement in Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or

Ohio Admin. Code chs. 3745-54 to 57 and 3745-205 [40 C.F.R. Part 264] (if the facility should have been permitted).

Finally, EPA has determined that Core violated RCRA requirements related to hazardous waste determinations, land disposal restrictions, and used oil management, as described in paragraphs 7-9, below.

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSDF REQUIREMENTS**

At the time of the inspection, Core was out of compliance with the following large quantity generator permit exemption conditions:

1. Date When Each Period of Accumulation Begins

Under Ohio Admin. Code § 3745-52-34(A)(2) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, Core maintained one 90-day hazardous waste accumulation area outside in a fenced pen. In this area was one 55-gallon drum labeled as “Hazardous Waste” and “Wet Mat.” This container was not marked with a start date of accumulation.

Also at the time of the inspection, Core maintained an area of drum storage for hazardous waste materials contaminated with acetone that were to be distilled. This area also included two 55-gallon drums that were designated for still bottoms. Each of these containers was labeled as “Hazardous Waste.” None of these containers was marked with a start date of accumulation.

*Note:* An employee marked a start date of accumulation on the 55-gallon drum labeled as “Wet Mat” in the outdoor storage area prior to completion of the inspection.

2. Hazardous Waste Satellite Accumulation Container Labeling

Under Ohio Admin. Code § 3745-52-34(C)(1)(b) [40 C.F.R. § 262.34(c)(1)(ii)], a large quantity generator must mark his satellite accumulation containers either with the words “Hazardous Waste” or with other words that identify the contents of the containers

At the time of the inspection, the following containers were marked neither with the words “Hazardous Waste” nor with other content-identifying words:

- One 5-gallon bucket was located beneath a tote of raw resin in the mixing area of the warehouse in Building A.
- One 55-gallon drum of filter cleanout resin from the tote of raw resin identified above. This container was labeled incorrectly as “Non-Hazardous Waste.”
- One purge bucket located in the robotic gel-coat application booth in Building B.

Ohio Admin. Code chs. 3745-54 to 57 and 3745-205 [40 C.F.R. Part 264] (if the facility should have been permitted).

Finally, EPA has determined that Core violated RCRA requirements related to hazardous waste determinations, land disposal restrictions, and used oil management, as described in paragraphs 7-9, below.

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At the time of the inspection, the following containers were marked neither with the words "Hazardous Waste" nor with other content-identifying words:

- One 5-gallon bucket was located beneath a tote of raw resin in the mixing area of the warehouse in Building A.
- One 55-gallon drum of filter cleanout resin from the tote of raw resin identified above. This container was labeled incorrectly as "Non-Hazardous Waste."
- One purge bucket located in the robotic gel-coat application booth in Building B.



**The permit exemption conditions identified below in paragraphs 3-6 are also independent TSDF requirements violated by Core:**

**3. Use and Management of Containers**

Under Ohio Admin. Code §§ 3745-52-34(C)(1)(a) and 3745-66-73(A) [40 C.F.R. §§ 262.34(c)(1)(i) and 265.173(a)], a large quantity generator must always keep a satellite accumulation container holding hazardous waste closed during storage, except for when it is necessary to add or remove waste.

At the time of the inspection, the following containers holding hazardous waste were not closed during accumulation and waste was not being added to or removed from these containers while they were open:

- Three 5-gallon buckets of "Spray-Up Resin" beneath the P024 feed tote.
- One 5-gallon and one 2.5-gallon bucket of "Spray-Up Resin" beneath the P023 feed tote.
- One 2.5-gallon bucket of "Spray-Up Resin" beneath the P018 feed tote.
- One 5-gallon bucket of resin (not labeled) located beneath a tote of raw resin located in the mixing area of the warehouse in Building A.
- One purge bucket in the robotic gel-coat application booth in Building B.

**4. Condition of Containers**

Under Ohio Admin. Code §§ 3745-52-34(A)(1)(a) and 3745-66-71 [40 C.F.R. §§ 262.34(a)(1)(i) and 265.171], a large quantity generator using containers that are not in good condition to hold hazardous waste, must either transfer the waste to different containers or manage the waste in another manner that complies with applicable regulations.

At the time of the inspection, the top of one 55-gallon drum of hazardous waste in the 90-day storage area was bulging. The containers of volatile organic waste are exposed to direct sunlight, which may have contributed to the bulging.

**5. Contingency Plan**

Under Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-52(E) [40 C.F.R. §§ 262.34(a)(4) and 265.52(e)], a large quantity generator must provide the facility with a contingency plan which includes, among other things, a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. This list shall be kept up to date. In addition, the contingency plan shall include the location and a physical description of each item on the list, and a brief outline of its capabilities.

At the time of the inspection, the contingency plan did not include an emergency equipment list.



## 6. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. With respect to this training program, a large quantity generator must maintain, among other things, the following documents and records at its facility in accordance with Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-16(D) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)]:

- The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- A written job description for each position at the facility related to hazardous waste management;
- A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and
- Records that document that the training or job experience described above has been given to and completed by facility personnel.

At the time of the inspection, Core did not have a list of job title(s) related to hazardous waste management and the name of the employee filling these position(s). Core did not have written descriptions of each position related to hazardous waste management or of the type and amount of introductory and continuing training given to these employees. Lastly, Core did not have all training records available for review during the inspection.

*Note:* Core provided the above-mentioned training-related documents in an email to EPA dated January 21, 2016. EPA is not requesting further information regarding the above violation at this time.

**Summary of permit exemption conditions:** By failing to comply with the conditions for a permit exemption, above, Core became an operator of a hazardous waste storage facility, and was required to obtain an Ohio hazardous waste storage permit. Core failed to apply for such a permit. Core's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ohio Admin. Code §§ 3745-50-45(A) and 3745-50-41(A) and (D) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 is also an independent violation of the corresponding TSDF requirement.

## **VIOLATIONS OF WASTE DETERMINATIONS, LAND DISPOSAL RESTRICTIONS, AND USED OIL GENERATOR REQUIREMENTS**

**Core violated the following generator requirements:**

### 7. Hazardous Waste Determination

A generator must determine whether its waste is hazardous using the method prescribed under Ohio Admin. Code § 3745-52-11 [40 C.F.R. § 262.11]. Records supporting a

determination made in accordance with Ohio Admin. Code § 3745-52-11 [40 C.F.R. § 262.11] must be kept for at least three years from the date the waste was last sent to on-site or off-site treatment, storage, or disposal. See, Ohio Admin. Code 3745-52-40(C) [40 C.F.R. § 262.40(c)].

At the time of the inspection, Core had not made determinations in accordance with the above regulation for the following wastes:

- “Bad Glue” - Two 55-gallon drums of “Bad Glue” were located at the east end of the warehouse in Building A. Core has not evaluated this material.
- Spent Acrastrip - Core has determined that waste Acrastrip which has been consolidated for discard is hazardous based on the potential presence of acetone in the waste. The unconsolidated waste, however, is managed throughout the facility as non-hazardous. Documentation was not provided to support either determination.
- Absorbents contaminated with oil - Documentation of a waste determination for this waste was not available for review.
- Used lacquer thinner and solvent contaminated rags – Profiles for both of these wastes included the D035/F005 waste numbers. Chemicals that correlate with these numbers were not identified during the inspection as constituents in raw production materials or in cleaning solvents currently utilized at the facility.

#### 8. Land Disposal Restrictions

Under Ohio Admin. Code § 3745-270-07(A)(5) [40 C.F.R. § 268.7(a)(5)], a generator who treats prohibited wastes in containers regulated under Ohio Admin. Code § 3745-52-34 [40 C.F.R. § 262.34] to meet applicable land disposal restriction treatment standards found at Ohio Admin. Code § 3745-270-40 [40 C.F.R. § 268.40], the generator must develop and follow a written waste analysis plan (WAP) which describes the procedures they will carry out to comply with the treatment standards.

Core has developed a WAP. According to the WAP, “Waste gelcoat & resin product should always have a hazardous material label on them. Once the gelcoat and resin has been catalyzed paint over or remove all labels.” One 55-gallon drum located at the loading dock of Building A, and two buckets located outside of the north side entrance to Building B, contained waste gelcoat and/or resin. These containers were not labeled as “Hazardous Material” or as “Hazardous Waste” at the time of the inspection.

*Note:* The 55-gallon drum located at the loading dock of Building A was marked as “Hazardous Waste” prior to completion of the inspection.

#### 9. Used Oil Requirement

Under Ohio Admin. Code § 3745-279-22(B)(4) [40 C.F.R. § 279.22(b)(4)], a generator who directs shipments of off-specification used oil from his facility to a used oil burner or who first claims that used oil that is to be burned for energy recovery meets the used oil fuel specifications set forth in Ohio Admin. Code § 3745-279-11 [40 C.F.R. § 279.11]

must also comply with 3745-279-70 through 3745-279-75 [40 C.F.R. part 279, subpart H] for used oil marketers.

At the time of the inspection, a Core employee stated that used oil generated at the facility was sent to a local business for burning in a space heater. Core has not determined if the oil is on or off-specification, and has not been complying with the used oil marketer regulations.

#### AREA OF CONCERN

A sump collecting water that is contaminated with hydraulic fluid from RTM presses is located in Building B. The oil in the sump is not intentionally added to the water, which seeps into this sump from the groundwater table. The amount of oil in this water may be insignificant. However, this sump may need to be inspected for cracks and perhaps sealed in order to prevent seepage of hydraulic fluid back into the groundwater table.

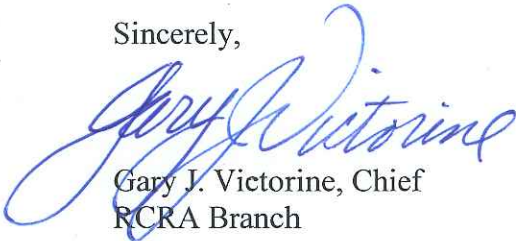
#### CONCLUSION

At this time, EPA is not requiring Core to apply for an Ohio hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1-6, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with each of the conditions and requirements, above. You should submit your response to Brenda Whitney, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at [whitney.brenda@epa.gov](mailto:whitney.brenda@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Jeff Smith, OEPA – [Jeffrey.smith@epa.ohio.gov](mailto:Jeffrey.smith@epa.ohio.gov)  
Bruce McCoy, OEPA – [Bruce.McCoy@epa.ohio.gov](mailto:Bruce.McCoy@epa.ohio.gov)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

**Compliance Evaluation Inspection Report**

**Date of Inspection:** December 16, 2015

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**Facility Name:** Core Composites Cincinnati, LLC

**Facility Address:** 4174 Half Acre Road  
Batavia, Ohio 45103

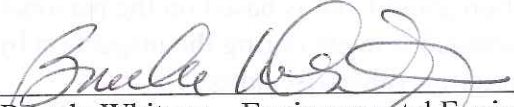
**EPA RCRA ID Number:** OHD052150703

**Generator Status:** Large Quantity Generator

**Facility Contact:** Robert Brennan – Plant Manager

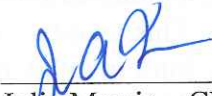
**U.S. EPA RCRA Inspector:** Brenda Whitney - Environmental Engineer  
Land and Chemicals Division  
Resource Conservation and Recovery Act (RCRA) Branch  
Compliance Section 2

**Prepared By:**

  
Brenda Whitney – Environmental Engineer

1-7-2016  
Date

**Approved By:**

  
Julie Morris – Chief, Compliance Section 2

1/8/16  
Date

**Purpose of Inspection**

I conducted an unannounced Compliance Evaluation Inspection (CEI or “Inspection”) of the Core Composites Cincinnati, LLC, facility (“Core”) located in Batavia, Ohio, on December 16, 2015. This CEI was an evaluation of Core’s compliance with the RCRA hazardous waste regulations codified in the Ohio Administrative Code and the Code of Federal Regulations. The Facility has notified as a large quantity generator of hazardous waste generating more than 1,000 kilograms of hazardous waste per month. Jeff Smith and George Strobel of the Ohio Environmental Protection Agency was also participated in this CEI.

## **Participants**

Robert Brennan – Plant Manager	Core
Jeff Smith – Environmental Specialist	OEPA
George Strobel – Supervisor	OEPA
Brenda Whitney – Environmental Engineer	U.S. EPA

## **Introduction**

Upon arrival at Core, Mr. Smith, Mr. Strobel, and I signed in at the front desk. The attendant contacted Mr. Brennan who led us to a conference room for an introductory meeting. I delineated the purpose and logistics of the CEI to Mr. Brennan and we discussed Core's hazardous waste generation sources and management methods. I informed Mr. Brennan that I would be taking photographs during the CEI as needed. I provided the following compliance assistance documents; Onsite Pollution Prevention Assistance (*OEPA brochure*); *P2 Technical Assistance Contacts*; and *U.S. EPA Small Business Resources*. We discussed the procedures EPA uses for controlling confidential business information (CBI). After being given an overview of the processes and waste generation sources by Mr. Brennan, we were escorted on a walking tour of the facility before returning to office to review records. The records review was completed the following day on December 17<sup>th</sup>. Upon completion of the CEI, I held a closing conference with Mr. Brennan.

## **Site Description**

The following information about Core is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.

Core is owned by Core Molding Technologies, an international public corporation with a total of six facilities headquartered in Columbus, Ohio. This facility comprised of two main manufacturing buildings, A and B. Building A, built in 1980, is approximately 69,000ft<sup>2</sup> and Building B (more recent addition) is approximately 28,000ft<sup>2</sup> in size. Because of a down-turn in production requirements, the 85 employees at this facility work one 8-hour shift.

Core manufactures large fiberglass pieces such as body components of semi-truck tractors. Core utilizes basic molding techniques including open and closed resin transfer molding (RTM).

Open molding incorporates either a robotic spray line or a manual spray line. In either line, the mold is first rubbed with a mold release to ensure that the fiberglass does not stick and create imperfections. Then a gel coat layer is applied to give the product a hard finished surface. In the robotic lines a chopped glass (fiberglass) and a catalyzed binding resin are sprayed into a mold using robotic spray guns. In the manual line, an operator applies premade mats of fiberglass into the mold and then uses a manual sprayer to apply catalyzed resin. When the proper thickness of



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# Appendix A

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## Photograph Log

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**Inspection Date:**

December 16, 2015

**Facility Name and ID Number:**

Core Composites Cincinnati, LLC

EPA ID: OHD052150703

**Inspector and Photographer:**

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

**Camera Used:**

Olympus Stylus 600

Serial Number: A47525904

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### Photograph 1

Taken at 9:22am CST

Beneath the resin feed station for pump P024 were three open 5-gallon buckets of waste "Spray-Up Resin."



### Photograph 2

Taken at 9:28 am CST

Beneath the resin feed station for pump P023 was one open 5-gallon bucket of waste "Spray-Up Resin."

Waste resin spills are evident next to the container,





### Photograph 3

Taken at 9:28 am CST

Beneath the resin feed station for pump P023 was one open 2.5-gallon bucket of waste "Spray-Up Resin."



### Photograph 4

Taken at 9:44 am CST

Beneath pump P018 in the northwest corner of the building, were two 2.5-gallon buckets for resin clean-outs. Both containers were labeled as "Spray-up Resin." The left-most bucket was open at the time of the inspection. Mr. Brennan adjusted the lid to cover more of the opening of the container.



### Photograph 5

Taken at 10:23 am CST

The line flush from RTM presses collects in a 5-gallon bucket connected to each press with plastic tubing. The tubing fits into a hole cut into the top of the bucket. Each of the buckets observed was also labeled with the words "Resin Flush."



### Photograph 6

Taken at 11:11 am CST

One 5-gallon bucket beneath a tote of raw resin was located in the mixing area of the Warehouse in Building A. This bucket was open, and was not labeled.





## Photograph 7

Taken at 11:11 am CST

A 55-gallon drum from filter cleanouts from the resin mixing tote identified in Photograph 6 was closed and labeled as "Non-Hazardous Waste."



## Photograph 8

Taken at 11:16 am CST

This cart of containers was located in the Mold Repair. The white bucket on the left had a sticker in front of it stating "Dirty Solvent Rags." However, the bucket states that these rags will be laundered at the site. The container is for non-hazardous waste only.





## Photograph 9

Taken at 11:35 am CST

The left-most 55-gallon drum contains acetone contaminated resin and gel-coat awaiting distillation. The two 55-gallon drums to the right were labeled as containing "Still Bottoms." These containers were not marked with start dates of accumulation.



## Photograph 10

Taken at 11:50 am CST

This photograph shows the three containers that are involved with the Acrastrip reclamation system. The drum second from the left contained used Acrastrip. The leftmost drum was empty and was to be used for collection of the reusable supernatant pulled from the drum of used Acrastrip. The 55-gallon drum at the right in the background was the consolidation container for the solid catalyzed resin that was to be removed from the bottom of the container of used Acrastrip. This drum was marked as "Hazardous Waste" and



### Photograph 11

Taken at 11:55 am CST

One the loading dock at the east end of the facility, I observed one 55-gallon drum marked as "Non-Hazardous Waste." According to Core personnel, this container is used to kick-off spent uncatalyzed gel-coat. The "NON" was marked over at the time of the inspection.



### Photograph 12

Taken at 12:14 pm CST

Containers of hazardous waste are stored in the 90-day area.





### Photograph 13

Taken at 12:14 pm CST

The container on the left of this photograph contains hazardous waste. The container was not marked with a start date of accumulation.



### Photograph 14

Taken at 12:14 pm CST

This drum was labeled as contained used oil. The drum was also labeled as "Non-Hazardous Waste." Records documenting that the material was a non-hazardous waste or was on-specification used oil were not available.



### Photograph 15

Taken at 1:19 pm CST

Two 55-gallon drums of "Bad Glue" dated from 6/10/13 were located in a storage rack at the east end of the of the Building A Warehouse.



### Photograph 16

Taken at 1:21 pm CST

The drum identified in Photograph 11 was labeled as "Hazardous Waste" prior to the conclusion of the inspection.



## Photograph 17

Taken at 1:25 pm CST

Outside the entrance to Building B, were two 2.5-gallon buckets of resin and gel-coat that were being kicked-off. The containers were neither closed nor labeled.







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# Appendix B

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## Checklists

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**Inspection Date:**

December 16, 2015

**Facility Name and ID Number:**

Core Composites Cincinnati, LLC

EPA ID: OHD052150703

**Inspector:**

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

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# LARGE QUANTITY GENERATOR REQUIREMENTS

## COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds:  $\text{Amount in gallons} \times \text{Specific Gravity} \times 8.345 = \text{Amounts in pounds}$ .

Safety Equipment Used:

### GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were biennial reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)] (filed on even years for previous year)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are biennial reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77? <i>OPEN CONTAINERS OK ACCORDING TO DEPA GUIDANCE</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

Facility Name/Inspection Date]

[ID Number]

LQG Checklist April 2014 revision

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	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Complete appropriate checklist for each unit.					
NOTE: If waste is treated to meet LDRs, use LDR checklist.					
11.	Does the generator export hazardous waste? If so:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c.	For manifests that have not been returned to the generator, has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<b>MANIFEST REQUIREMENTS</b>					
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]					
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]					
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.					
17.	If the generator received a rejected load or residue, did the generator:				
	a.	Sign item 20 of the new manifest or item 18c of the original manifest?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>



	[3745-52-23(F)(1)]	
b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

#### PERSONNEL TRAINING

21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

25.	Does the generator provide refresher training to employees during each period from January 1 <sup>st</sup> to December 31 <sup>st</sup> and does each training occur within 15 months after the previous training? [3745-65-16(C)]		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:				
	a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

*NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.*

Job Performed	Name of Employee	Date Trained

#### CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
29.	Does the plan describe the following:				
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)] <i>No Documentation</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] <i>Plant Manager</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

#### EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.



PREPAREDNESS AND PREVENTION			
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Verify that the equipment is listed in the contingency plan.</i>			
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, and hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS			
43.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>



b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

#### USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
46.	The date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container? [3745-52-34(A)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:			
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71] <i>Bulging or Pulling in depending on weather</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] <i>Weather could be a factor</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

Facility Name/Inspection Date]  
[ID Number]

<b>NOTE:</b> Record location on process summary sheets, photograph the area, and record on facility map.			
48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>NOTE:</b> OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.			
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>NOTE:</b> Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]			
<b>PRE-TRANSPORT REQUIREMENTS</b> <i>According to Facility / Not Observed</i>			
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>



**GENERATOR LDR CHECKLIST  
DOES NOT APPLY TO CESQGS**

**GENERAL REQUIREMENTS**

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

*NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).*

3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

*FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.*

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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*NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.*

*NOTE: Written documentation of this determination is not required.*

7.	Did the generator treat his HW /soil on-site <u>to meet the LDR treatment standard</u> <i>catalyst plus resin</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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*NOTE: If "Yes" see question #16.*

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
i	Applicable HW codes?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
ii	Manifest number of the first shipment to the TSD?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
iii	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a. Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

#### NOTIFICATION FORM

11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
--	----	---	--

NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

#### PROHIBITED DILUTION

12.	Is the HW treated by burning?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If "No" go to #15.	
13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>



	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.		Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: If "Yes", HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

#### GENERATOR TREATMENT

16.		Does the generator treat to meet LDRs on-site?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building <u>to meet</u> the LDR treatment standard?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.	
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> BW
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> BW
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> BW
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

#### NOTIFICATION FORM FOR GENERATOR TREATMENT

17.	a.	Contains all information in #11 a-g above and	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> BW
-----	----	---	---

	b.	<p>If the treated HW/soil is listed.....notification contains the following certification statement:</p> <p>"I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><del>DID NOT SEE</del> BW</p>
	c.	<p>If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:</p>	
	i.	<p>Prepare a one-time notification? [3745-270-09 (D)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
	ii.	<p>Maintain a copy of the notice onsite? [3745-270-09(D)]</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
	iii.	<p>Include in the notification: [3745-270-09(D)]</p>	
		<p>1. Name &amp; address of receiving landfill?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
		<p>2. Description of HW when generated?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
		<p>3. HW code when generated?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
		<p>4. Treatability group when generated?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
		<p>5. Underlying hazardous constituents present when generated?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
	iv.	<p>Contain the certification statement as required by 3745-270-07(B)(4)?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>



## SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS BATTERIES AND LAMPS

**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more**

**Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less**

### PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

### WASTE MANAGEMENT AND LABELING/MARKING

#### UNIVERSAL WASTE BATTERIES

*None Observed*

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

#### UNIVERSAL WASTE LAMPS

8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.**

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Small Quantity Universal Waste Handler – Batteries And Lamps Checklist April 2014 revision

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10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)" [3745-273-14(E)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>ACCUMULATION TIME</b>					
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Accumulation is defined as date generated or date received from another handler.					
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	If yes, describe below:				
<b>EMPLOYEE TRAINING</b>					
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>RESPONSE TO RELEASES</b>					
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<b>OFF-SITE SHIPMENTS</b>					
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.					
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	If no, make aware of 49 CFR 171-180.				
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of</u> the following:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

#### EXPORTS

*NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]*

*NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.*

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## USED OIL INSPECTION CHECKLIST GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

**NOTE:** 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at

[https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp) to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:

[https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp).

### PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

### GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
UNKNOWN				

**NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

#### ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	SELLS FOR SOMEONE TO BURN		
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

#### GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

#### COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

No MARKETER RECORDS.

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# Appendix C

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## Documents received during the Inspection:

- Facility Layout Map
  - Waste Analysis Plan (1/31/13)
  - MSDS Resin
  - SDS Acrastrip 600
- 

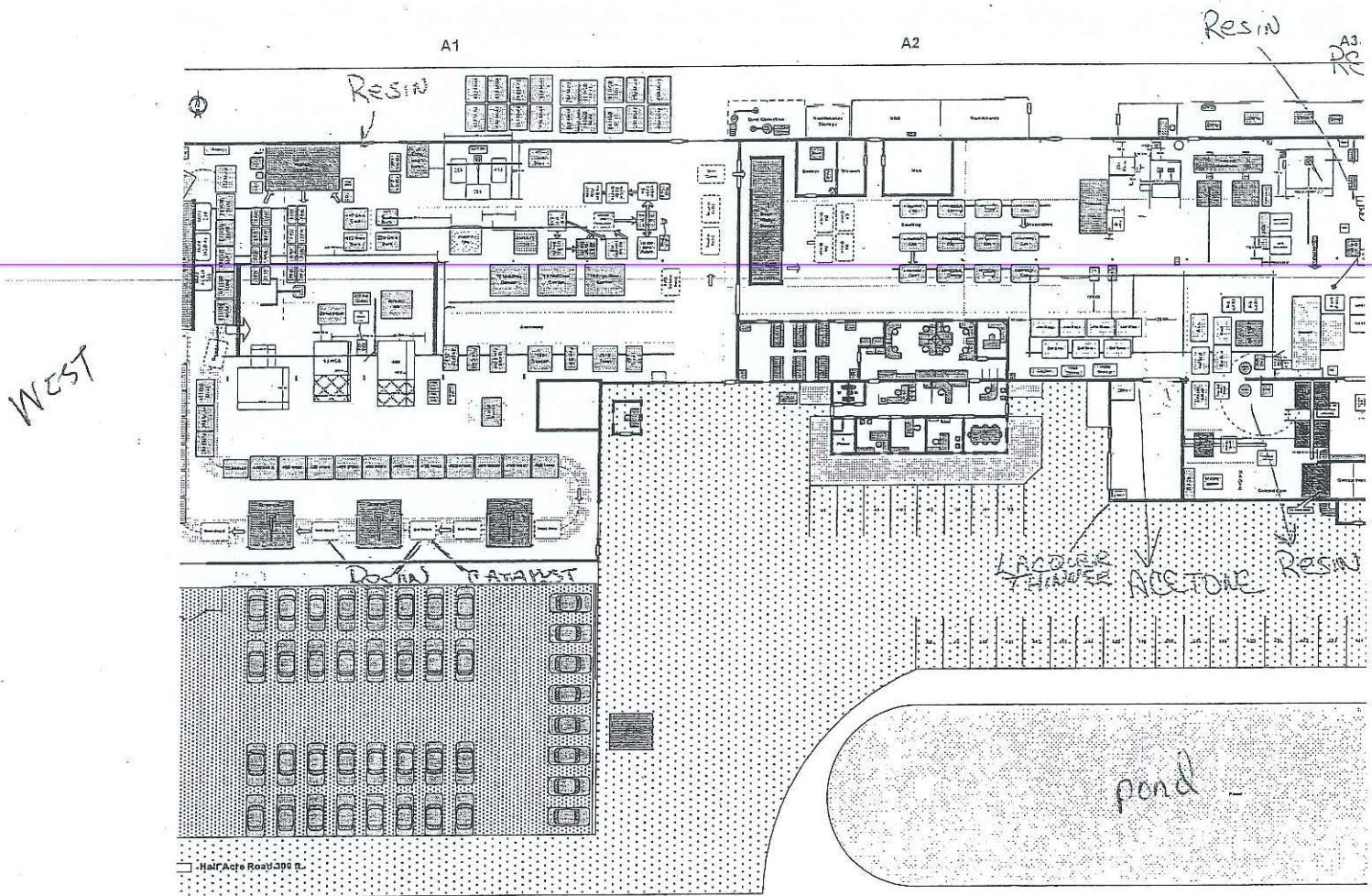
**Inspection Date:**  
December 16, 2015

**Facility Name and ID Number:**  
Core Composites Cincinnati, LLC  
EPA ID: OHD052150703

**Inspector:**  
Brenda Whitney  
Compliance Section 2  
RCRA Branch  
Land and Chemicals Division

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## Core Composites Cincinnati

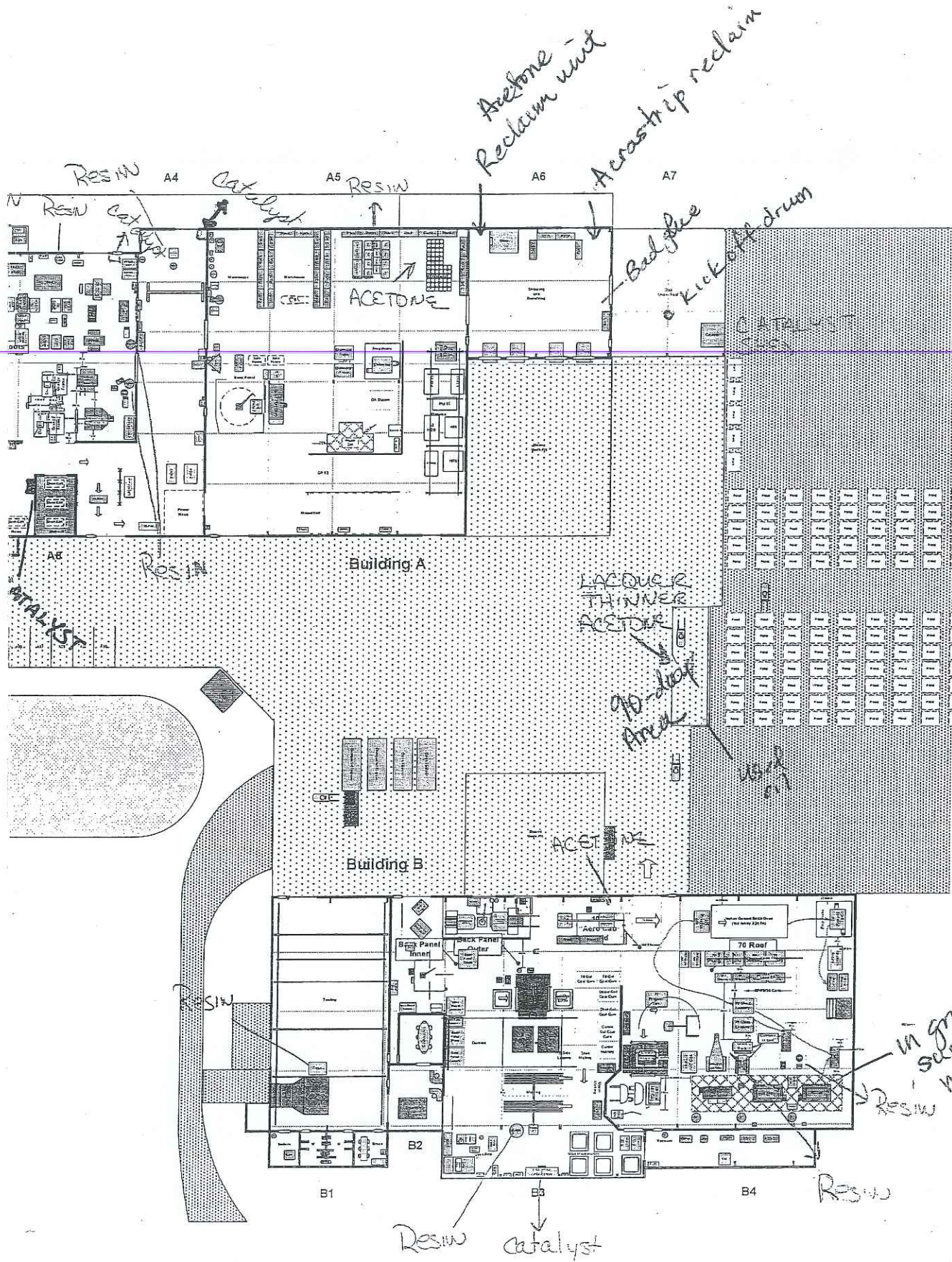
Building A 67,000 sq ft

Building B 28,000 sq ft

Original rev 11/1/05 Rev 10/2012







Robert Brown  
2/25/14





Core Composites Cincinnati, LLC  
4174 Half Acre Road  
Batavia, Ohio 45103

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E-mail: rbrennan@coremt.com

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## **WASTE ANALYSIS PLAN FOR TREATING GELCOAT & RESIN ON-SITE**

*Core Composites Cincinnati, LLC  
4174 Half Acre Road  
Batavia, Ohio 45103*

*Generator ID: OHD052150703*

31 January 2013





# **Waste Analysis Plan for Treating Gelcoat & Resin On-Site**

*Core Composites Cincinnati, LLC*

*31 January 2013*

## **REGULATORY REQUIREMENTS**

USEPA and Ohio EPA allow generators to treat certain types of hazardous waste by specific methods. The agencies have a number of requirements for generators to follow in order to treat hazardous waste without a permit. The Federal Register for 5/12/97 pp. 26007-26008 defines "POLYM" Method of Treatment for High Total Organic Carbon, Ignitable D001 Wastes. Other requirements for generator treatment may be found at:

- Ohio Administrative Code (OAC) rules 3745-66-70 through 3745-66-77
- OAC 3745-270-07 Land Disposal Restrictions Standards
- OAC 3745-52-34(A), (B) and (C)
- 40 CFR 264 or 265, Subparts AA, BB, and CC

Core Composites Cincinnati will use the "POLYM" treatment method to polymerize our scrap gelcoat & resin. This material contains styrene and will polymerize once a catalyst is added to it. The goal of this treatment plan is to control how and when the material polymerizes.

## **DESCRIPTION OF PROCESS GENERATING WASTE STREAM**

Gelcoat & resin are used in the manufacturing of fiberglass reinforced plastic parts. In their raw state, gelcoat & resin are a thick liquid with a consistency similar to molasses. An organic peroxide is added to the gelcoat & resin so that when they are applied to a mold, they react and harden into a non-hazardous material.

The gelcoat and resin are filtered prior to use in production. This filtering is to remove any contaminants or large particles of gelcoat & resin that may clog the spray equipment. This material is a thick "sludge" material that is no longer suitable for production.



## DESCRIPTION OF UNTREATED WASTE

Gelcoat & resin are classified as a flammable liquid, so when they become a waste it has a USEPA waste code of D001. The flash point is between 80°F and 90°F. There are no underlying hazardous constituents for this waste; this is the only waste code associated with this waste.

The material safety data sheet lists the following ingredients and weight percents:

### Production Gelcoat

CAS #	Component	Weight %
Proprietary	Unsaturated Polyester Resin	40 - 50
100-42-5	Styrene	36.762
014807-96-6	Talc	5 - 10
001333-86-4	Carbon Black	2.245
000136-52-7	Cobalt 2-Ethylhexanoate	.0154

### Tooling Gelcoat

CAS #	Component	Weight %
	Vinyl Ester Resin	40 - 50
100-42-5	Styrene	39.175
Proprietary	Unsaturated Polyester Resin	1 - 5
025013-15-4	Vinyl Toluene	4.263
000136-52-7	Cobalt 2-Ethylhexanoate	.126
027253-31-2	Cobalt Neodecanoate	.045

### Production Closed Molding Resin

CAS #	Component	Weight %
Proprietary	Unsaturated Polyester Resin	58 - 60
100-42-5	Styrene	39 - 41
Proprietary	Cobalt Compounds	<.04
N/A	Residual additives, modifiers, colorants & reactants	<5

### Production Open Molding Resin

CAS #	Component	Weight %
Proprietary	Unsaturated Polyester Resin	64 - 66
100-42-5	Styrene	29 - 31
98-83-9	Alpha-methylstyrene	<=1.6
N/A	Residual additives, modifiers, colorants & reactants	<5





#### Tooling Resin

CAS #	Component	Weight %
100-42-5	Styrene	36.96
025013-15-4	Vinyl Toluene	11.2
Proprietary	Unsaturated Polyester Resin	5 - 10
000868-77-9	Hydroxyethyl Methacrylate	1.824
000136-52-7	Cobalt 2-Ethylhexanoate	.063
027253-31-2	Cobalt Neodecanoate	.024

The organic peroxide Methyl Ethyl Ketone Peroxide (CAS #1338-23-4) is added to the gelcoat & resin to catalyze it. An amount of catalyst equal to two - three weight percent of the gelcoat & resin are added to the container.

#### TREATMENT METHOD

The following steps are followed to treat the gelcoat & resin.

1. Make sure the container of gelcoat or resin is less than 3/4 full.
2. Add 2 - 3 percent by weight of catalyst to the container. Stir the container slowly to thoroughly mix the material
3. After two hours, check the progress of the reaction. If the top of the material is hard and dry, and the container has cooled to the touch the reaction is complete. Check it about once an hour until complete.
4. After the material is cool (this can take anywhere from an hour to a day), spray over or remove all old labels and place the material into the dumpster for disposal.

The POLYM treatment method issued by USEPA allows plastics manufacturers to treat excess polymers as long as the treatment results in a solid, non-hazardous waste and that the method is essentially equivalent to the way the plastic product is normally made. This material is normally cured into a solid by adding catalyst and applying it to a mold. All waste gelcoat & resin already has the catalyst added to it.

#### TESTING FREQUENCY

This material will be tested every two years. The solid waste has been sent to the landfill for many years, in compliance with their testing and profiling. Whether the gelcoat & resin becomes solid through auto-polymerization or through our controlled treatment, there is no difference in the end product.



Test results will be available in Core Composites Cincinnati, LLC.

## **WASTE DISPOSAL PROCEDURE**

The following methods and procedures will be used for disposal of the waste stream generated by the molding area including gelcoat & resin.

Supervisors must know the procedures and review this procedure with employee's yearly and new employees before they can become part of this procedure.

Waste gelcoat & resin product should always have a hazardous material label on them. Once the gelcoat and resin has been catalyzed paint over or remove all labels.

If the top of the material is hard and dry, and the container has cooled to the touch the reaction is complete. Check it about once an hour until complete.

All gelcoat & resin catalyzed material goes into a dumpster to be disposed of into the compactor.

Catalyst should never be mixed and should be disposed of in their original containers if possible. It would be best to use the catalyst in the gelcoat & resin disposal sequence. Try to have original supplier dispose or check with Environmental Personnel for the best method to store until disposal can occur. **KEEP REFRIGERATED.**





## **ATTACHMENT 2**

### **Gel Coat and Resin Wastes Notification and Certification**

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## Gel Coat/Resin Wastes

### Treatment to Non-Hazardous Characteristics

#### Notification/Certification

30 January 2013

Wastes that exhibit a characteristic are also subject to the requirements of Ohio Administrative Code (OAC) 3745-270-07, except that once the waste is no longer hazardous, a one-time notification and certification must be placed in the generator's on-site file. This notification must be updated if the process or operation generating the waste changes and/or if the licensed solid waste landfill facility receiving the waste changes.


Name of Licensed Solid Waste Facility: **Rumpke Waste & Recycling Services**

Address of Licensed Solid Waste Facility: **9427 Beyers Road  
Georgetown, Ohio 45121**

Resin and Gel Coats are used in the manufacturing of fiberglass reinforced plastic parts. An organic peroxide is added to react the materials for molding purposes. Prior to reacting, the resin and gel coats are classified as a flammable liquid, D001. Because this waste is "treated" using the "POLYM" treatment method, there is no requirement to list any of the underlying hazardous constituents in this notice.

#### Certification:

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in rule 3745-270-40 of the Ohio Administrative Code without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

  
Signature

  
Date







RES-4  
REV. 11/11/13

## Material Safety Data Sheet

FOR INDUSTRIAL USE ONLY

### 733-8477-30 Spray Up UPR

Revision Date 09-MAY-2012

#### 1. Product and company identification

**Product name** 733-8477-30 Spray Up UPR

**MSDS Number** 150000066216

**Product Type** Resin

**Product use** Industrial use.

**Manufacturer, Importer,  
Supplier** PCCR USA, INC.  
99 East Cottage Avenue  
Carpentersville IL 60110

MSDS@pccrusa.com

**Print date** 08-JAN-2013

**Telephone** **For Emergency Transportation Information**  
CHEMTREC US Domestic (800) 424-9300  
CHEMTREC International (703) 527-3887

For additional health and safety or regulatory information, call 1 847-836-3659.

#### 2. Hazards identification

**Form** Viscous liquid.

**Odor** Styrene

**OSHA/HCS status** This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).

**Emergency overview** WARNING !  
FLAMMABLE LIQUID AND VAPOR. MAY FORM EXPLOSIVE MIXTURES WITH AIR. INHALATION CAUSES HEADACHES, DIZZINESS, DROWSINESS AND NAUSEA AND MAY LEAD TO UNCONSCIOUSNESS. CAUSES RESPIRATORY TRACT, EYE AND SKIN IRRITATION. MAY CAUSE ALLERGIC SKIN REACTION.

##### Potential acute health effects

**Inhalation** Can cause central nervous system (CNS) depression. Irritating to respiratory system.

**Ingestion** Can cause central nervous system (CNS) depression.

**Skin** Irritating to skin. May cause sensitization by skin contact.

**Eyes** Irritating to eyes.

**Potential chronic health effects**

<b>Chronic effects</b>	Contains material that can cause target organ damage.
<b>Carcinogenicity</b>	Contains material which may cause cancer, based on animal data. Risk of cancer depends on duration and level of exposure.
<b>Mutagenicity</b>	No known significant effects or critical hazards.
<b>Teratogenicity</b>	No known significant effects or critical hazards.
<b>Developmental effects</b>	No known significant effects or critical hazards.
<b>Fertility effects</b>	No known significant effects or critical hazards.
<b>Target organs</b>	Contains material which causes damage to the following organs: kidneys, liver, upper respiratory tract, eyes, central nervous system (CNS), ears Review Section 2 and 11 for any additional assessments.

**Over-exposure signs/symptoms**

<b>Inhalation</b>	Adverse symptoms may include the following: nausea or vomiting, respiratory tract irritation, coughing, headache, drowsiness/fatigue, dizziness/vertigo, unconsciousness.
<b>Ingestion</b>	Adverse symptoms may include the following: nausea or vomiting, dizziness/vertigo, drowsiness/fatigue, headache, unconsciousness.
<b>Skin</b>	Adverse symptoms may include the following: irritation, redness.
<b>Eyes</b>	Adverse symptoms may include the following: pain or irritation, watering, redness.
<b>Medical conditions aggravated by over-exposure</b>	Pre-existing skin disorders and disorders involving any other target organs mentioned in this MSDS as being at risk may be aggravated by over-exposure to this product.

See section 11 for more detailed information on health effects and symptoms.

**3. Composition/Information on ingredients**

<u>Ingredient name</u>	<u>CAS number</u>	<u>WT %</u>
Styrene	100-42-5	31.0
alpha-methylstyrene	98-83-9	1.0 - 5.0

*\*\* Any applicable Canadian trade secret numbers will be listed in Section 15.*

**4. First aid measures**

<b>Eye contact</b>	Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Get medical attention.
<b>Skin contact</b>	Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Wash contaminated clothing thoroughly with water before removing it, or wear gloves. Continue to rinse for at least 10 minutes. Get medical attention. In the event of any complaints or symptoms, avoid further exposure. Wash clothing before reuse. Clean shoes thoroughly before reuse.
<b>Inhalation</b>	Move exposed person to fresh air. If it is suspected that fumes are still

present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. Keep person warm and at rest. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband. Get medical attention.

**Ingestion**

Wash out mouth with water. Do not induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Get medical attention immediately.

**Protection of first aid personnel**

No action shall be taken involving any personal risk or without suitable training. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves. If it is suspected that dust, vapor, mist or gas are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus.

**Notes to physician**

No specific treatment. Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

See section 11 for more detailed information on health effects and symptoms.

## 5. Fire-fighting measures

**Flammability of the product**

Flammable liquid. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion. Runoff to sewer may create fire or explosion hazard.

**Extinguishing media**  
**Suitable**

Use dry chemical, CO<sub>2</sub>, water spray (fog) or foam.

**Not suitable**

Do not use water jet.

**Special exposure hazards**

Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool.

**Hazardous combustion products**

Decomposition products may include the following materials: carbon oxides,

**Special protective equipment for fire-fighters**

Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

**Special Remarks on Explosion Hazards**

Liquid and vapor may cause a flash fire or ignite explosively. Vapor is heavier than air and may settle in low places or spread long distances to a source of ignition and flashback. Explosive atmospheres may linger. Closed containers can rupture and release toxic vapors or decomposition products.

## 6. Accidental release measures

**Personal precautions**

No action shall be taken involving any personal risk or without suitable

training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Shut off all ignition sources. No flares, smoking or flames in hazard area. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment (see section 8). Do not breathe dust, vapor, mist or gas.

**Environmental precautions**

Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

**Large spill**

Stop leak if without risk. Move containers from spill area. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see section 13). Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see section 1 for emergency contact information and section 13 for waste disposal.

**Small spill**

Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble or absorb with an inert dry material and place in an appropriate waste disposal container. Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor.

## 7. Handling and storage

**Handling**

Put on appropriate personal protective equipment (see section 8). Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Persons with a history of skin sensitization problems should not be employed in any process in which this product is used. Do not get in eyes or on skin or clothing. Do not ingest. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use non-sparking tools. Take precautionary measures against electrostatic discharges. To avoid fire or explosion, dissipate static electricity during transfer by grounding and bonding containers and equipment before transferring material. Follow US NFPA 30, "Flammable & Combustible Liquids Code", or other national, state and local codes on safe handling of flammable liquids. Train workers in the recognition and prevention of hazards associated with the storage, handling and transfer of flammable liquids in the plant. Empty containers retain product residue and can be hazardous. Do not reuse container. Do not breathe dust, vapor, mist or gas.

**Storage**

Store in an area designated for storage of flammable liquids (See NFPA 30 and OSHA 29 CFR 1910.106). Store in original container protected



from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see section 10) and food and drink. Eliminate all ignition sources. Separate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination.

## 8. Exposure controls/personal protection

### Ingredient name

Styrene

### Occupational exposure limits

#### **ACGIH TLV Time Weighted Average (TWA)**

85 mg/m<sup>3</sup> 20 ppm

#### **ACGIH TLV Short Term Exposure Limit (STEL)**

170 mg/m<sup>3</sup> 40 ppm

#### **OSHA PEL Z2 Time Weighted Average (TWA)**

100 ppm

#### **OSHA PEL Z2 Ceiling Limit Value**

200 ppm

#### **OSHA PEL Z2 Acceptable Maximum Peak (AMP)**

600 ppm

alpha-methylstyrene

#### **ACGIH TLV Time Weighted Average (TWA)**

48 mg/m<sup>3</sup> 10 ppm

#### **OSHA PEL Ceiling Limit Value**

480 mg/m<sup>3</sup> 100 ppm

**Consult local authorities for acceptable exposure limits.**

### **Recommended monitoring procedures**

If this product contains ingredients with exposure limits, personal, workplace atmosphere or biological monitoring may be required to determine the effectiveness of the ventilation or other control measures and/or the necessity to use respiratory protective equipment.

### **Engineering measures**

Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapor or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.

### **Hygiene measures**

Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

### **Respiratory**

Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.

<b>Hands</b>	Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary.
<b>Eyes</b>	Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists or dusts.
<b>Skin</b>	Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
<b>Environmental exposure controls</b>	Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

## 9. Physical and chemical properties

### Information on basic physical and chemical properties

<b>Appearance</b>	
Physical state	: Viscous liquid.
Color	: Reddish-brown
Odor	: Styrene
Odor threshold	: Not available
pH	: Not available
Boiling point	: Not available
Flash point	: 30 °C (86 °F) Setaflash Closed Cup ASTM D 3278
Evaporation rate	: Not available
<b>Flammable limits</b>	
Upper:	: Not available
Lower:	: Not available
Vapor pressure	: Not available
Vapor density	: Not available
Relative density	: 1.1 @25 °C (77 °F)
Solubility	: Negligible
Partition coefficient: n-octanol/water	: Not available
Auto-ignition temperature	: Not available
Decomposition temperature	: Not available
Viscosity	: Kinematic-Not available Dynamic- Not available
Typical % solids	: Not available

### Other information

Not applicable.

## 10. Stability and reactivity

<b>Reactivity</b>	Stable under normal conditions.
<b>Stability</b>	Hazardous polymerization may occur under certain conditions of storage or use.

<b>Conditions to avoid</b>	Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition.
<b>Materials to avoid</b>	Reactive or incompatible with the following materials: oxidizing materials,
<b>Hazardous decomposition products</b>	Under normal conditions of storage and use, hazardous decomposition products should not be produced.

## 11. Toxicological information

### Acute toxicity

#### Ingredient name

Styrene

LD50 Oral	Rat	2,650 mg/kg
LD50 Oral	Mouse	316 mg/kg
LC50 Inhalation	Rat	11.8 mg/l/4 h

alpha-methylstyrene

LD50 Oral	Rat	4,900 mg/kg
LD50 Oral	Mouse	4,500 mg/kg

### Other Toxicological Information

### Carcinogenicity

#### Classification

#### Ingredient name

Styrene

ACGIH	Not classifiable as to its carcinogenicity to humans.
IARC	Possibly carcinogenic to humans (Group 2B)
NTP	Reasonably anticipated to be a human carcinogen.
OSHA	Not classified
EU	Not classified.

alpha-methylstyrene

ACGIH	Confirmed animal carcinogen with unknown relevance to humans.
IARC	Not classified.
NTP	Not listed
OSHA	Not classified
EU	Not classified.

## 12. Ecological information

### Environmental effects

No known significant effects or critical hazards.

### Aquatic ecotoxicity

#### Ingredient name

Styrene

Fresh water	Acute LC50 4.02 mg/l/96 h	Fathead minnow
Salt water	Acute LC50 9.1 mg/l/96 h	Sheepshead minnow

### Other adverse effects

No known significant effects or critical hazards.

## 13. Disposal considerations

### Waste disposal

The generation of waste should be avoided or minimized wherever possible. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Disposal of this product, solutions and any

by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

## 14. Transport information

The data provided in this section is for information only and may not be specific to your package size or mode of transport. You will need to apply the appropriate regulations to properly classify your shipment for transportation.

### International transport regulations

Regulatory information	UN/NA number	Proper shipping name	Classes/*PG	Reportable Quantity (RQ)
CFR	1866	RESIN SOLUTION, flammable	Class 3 III	Styrene
TDG	1866	RESIN SOLUTION, flammable	Class 3 III	
IMO/IMDG	1866	RESIN SOLUTION, flammable	Class 3 III	Styrene
IATA (Cargo)	1866	RESIN SOLUTION, flammable	Class 3 III	Styrene

\*PG : Packing group

## 15. Regulatory information

### US regulations

HCS Classification Flammable liquid, Irritating material, Sensitizing material, Carcinogen, Target organ effects

### U.S. Federal regulations

SARA 311/312 Classification Immediate (acute) health hazard, Delayed (chronic) health hazard, reactive, Fire hazard

### SARA 313 - Supplier Notification

This product contains the following toxic chemical(s) subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986, and Subpart C-Supplier Notification Requirement of 40 CFR Part 372.  
Styrene - 100-42-5 ( 30.05%),

SARA 302 Extremely Hazardous Substances None required.

### State regulations

Massachusetts RTK Substances The following components are listed: Styrene, alpha-methylstyrene,

New Jersey RTK Hazardous Substances The following components are listed: alpha-methylstyrene, Styrene,

Pennsylvania RTK Hazardous Substances The following components are listed: Styrene,

California Prop. 65: None required.

### Canada

### WHMIS (Canada)

Class B-2: Flammable liquid  
Class D-2A: Material causing other toxic effects (Very toxic).  
Class D-2B: Material causing other toxic effects (Toxic).



## Canadian lists

Canadian NPRI: The following components are listed: Styrene,

International regulations

## Chemical inventories

Australia inventory (AICS) All components are listed or exempted.  
Canada inventory All components are listed or exempted.  
Europe inventory All components are listed or exempted.  
Japan inventory Not determined.  
China inventory (IECSC) All components are listed or exempted.  
Korea inventory All components are listed or exempted.  
New Zealand Inventory (NZIoC) Not determined.  
Philippines inventory (PICCS) Not determined.  
United States inventory (TSCA 8b) All components are listed or exempted.

**16. Other information****Hazardous Material  
Information System III  
(U.S.A.)**

Health : 2  
Flammability: 3  
Physical hazards : 1  
Chronic : \*

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings are not required on MSDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.  
The customer is responsible for determining the PPE code for this material.

<b>Prepared by</b>	Product Safety & Regulatory Compliance Group
<b>Date of issue</b>	09-MAY-2012
<b>Date of printing</b>	08-JAN-2013
<b>Version</b>	1.10

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Rec'd 11/5/14

**Safety Data Sheet**  
according to 1907/2006/EC (REACH),  
1272/2008/EC (CLP), and GHS

Page 1/9

Printing date: 11.04.2013

Revision: 11.04.2013

**1 Identification of the substance/mixture and of the company/undertaking**

- 1.1 Product identifier
- Trade name: **ACRASTRIP 600 CRR**
- 1.2 Relevant identified uses of the substance or mixture and uses advised against  
No further relevant information available.
- Application of the substance / the preparation: Cleaning agent/ Cleaner
- 1.3 Details of the supplier of the Safety Data Sheet
- Manufacturer/Supplier:  
U.S. Polychemical Corp  
584 Chestnut Ridge Road  
Chestnut Ridge, NY 10977  
Phone: 845-356-5530  
Toll Free: 800-431-2072
- 1.4 Emergency telephone number:  
CHEMTREC  
1-800-424-9300 (US/Canada)  
+01 703-527-3887 (International)

**2 Hazards identification**

- 2.1 Classification of the substance or mixture
- Classification according to Regulation (EC) No 1272/2008  
The product is not classified according to GHS regulations.  
The product is not classified according to the CLP regulation.
- Classification according to Directive 67/548/EEC or Directive 1999/45/EC Not applicable.
- Information concerning particular hazards for human and environment:  
The product does not have to be labelled due to the calculation procedure of the "General Classification guideline for preparations of the EU" in the latest valid version.
- Classification system:  
The classification is according to the latest editions of the EU-lists, and extended by company and literature data.  
The classification is in accordance with the latest editions of international substances lists, and is supplemented by information from technical literature and by information provided by the company.
- 2.2 Label elements
- Labelling according to Regulation (EC) No 1272/2008 N/A
- Hazard pictograms N/A
- Signal word N/A
- Hazard-determining components of labelling: None.
- Hazard statements: N/A
- Hazard description:
- WHMIS-symbols: Not hazardous under WHMIS.

(Contd. on page 2)

**Safety Data Sheet**  
according to 1907/2006/EC (REACH),  
1272/2008/EC (CLP), and GHS

Page 2/9

Printing date: 11.04.2013

Revision: 11.04.2013

Trade Name: ACRASTRIP 600 CRR

(Contd. of page 1)

· NFPA ratings (scale 0 - 4)



Health = 1  
Fire = 0  
Reactivity = 0

· HMIS-ratings (scale 0 - 4)



Health = 1  
Fire = 0  
Reactivity = 0

· HMIS Long Term Health Hazard Substances

None of the ingredients is listed.

- 2.3 Other hazards
- Results of PBT and vPvB assessment
- PBT: Not applicable.
- vPvB: Not applicable.

### 3 Composition/information on ingredients

- 3.2 Mixtures
- Description: Mixture of substances listed below with nonhazardous additions.
- Dangerous components: N/A
- Additional information: For the wording of the listed risk phrases refer to section 16.

### 4 First aid measures

- 4.1 Description of first aid measures
- General information: No special measures required.
- After inhalation: Supply fresh air; consult doctor in case of complaints.
- After skin contact:  
Immediately remove any clothing soiled by the product.  
Rinse with warm water.
- After eye contact:  
Remove contact lenses if worn.  
Rinse opened eye for several minutes under running water. Then consult a doctor.
- After swallowing:  
Rinse out mouth and then drink plenty of water.  
Do not induce vomiting; call for medical help immediately.
- 4.2 Most important symptoms and effects, both acute and delayed  
No further relevant information available.
- Hazards No further relevant information available.

(Contd. on page 3)



**Safety Data Sheet**  
according to 1907/2006/EC (REACH),  
1272/2008/EC (CLP), and GHS

Page 3/9

Printing date: 11.04.2013

Revision: 11.04.2013

Trade Name: ACRASTRIP 600 CRR

(Contd. of page 2)

- **4.3 Indication of any immediate medical attention and special treatment needed**  
No further relevant information available.

## 5 Firefighting measures

- **5.1 Extinguishing media**
- **Suitable extinguishing agents:**  
CO<sub>2</sub>, powder or water spray. Fight larger fires with water spray or alcohol resistant foam.
- **For safety reasons unsuitable extinguishing agents:** None.
- **5.2 Special hazards arising from the substance or mixture:** No further relevant information available.
- **5.3 Advice for firefighters**
- **Protective equipment:** No special measures required.
- **Additional information:** Cool endangered receptacles with water spray.

## 6 Accidental release measures

- **6.1 Personal precautions, protective equipment and emergency procedures** Not required.
- **6.2 Environmental precautions:**  
Dilute with plenty of water.  
Do not allow to enter sewers/ surface or ground water.
- **6.3 Methods and material for containment and cleaning up:**  
Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).
- **6.4 Reference to other sections**  
No dangerous substances are released.  
See Section 7 for information on safe handling.  
See Section 8 for information on personal protection equipment.  
See Section 13 for disposal information.

## 7 Handling and storage

- **7.1 Precautions for safe handling** No special measures required.
- **Information about fire - and explosion protection:** No special measures required.
- **7.2 Conditions for safe storage, including any incompatibilities**
- **Storage:**
- **Requirements to be met by storerooms and receptacles:** No special requirements.
- **Information about storage in one common storage facility:** Store away from foodstuffs.
- **Further information about storage conditions:** Store in cool, dry conditions in well-sealed receptacles.
- **7.3 Specific end use(s)** No further relevant information available.

## 8 Exposure controls/personal protection

- **Additional information about design of technical facilities:** No further data; see item 7.

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- **8.1 Control parameters**
- **Ingredients with limit values that require monitoring at the workplace:**  
The product does not contain any relevant quantities of materials with critical values that have to be monitored at the workplace.
- **DNELs** No further relevant information available.
- **PNECs** No further relevant information available.
- **Additional information:** The lists valid during the making were used as basis.

- **8.2 Exposure controls**

- **Personal protective equipment:**

- **General protective and hygienic measures:**

The usual precautionary measures are to be adhered to when handling chemicals.

Wash hands before breaks and at the end of work.

Keep away from foodstuffs, beverages and feed.

Avoid contact with the eyes.

Avoid close or long term contact with the skin.

- **Respiratory protection:**

Not necessary if room is well-ventilated.

Use suitable respiratory protective device when aerosol or mist is formed.

- **Protection of hands:**



Protective gloves

The glove material has to be impermeable and resistant to the product/ the substance/ the preparation. Selection of the glove material on consideration of the penetration times, rates of diffusion and the degradation

- **Material of gloves**

Neoprene gloves

The selection of the suitable gloves does not only depend on the material, but also on further marks of quality and varies from manufacturer to manufacturer. As the product is a preparation of several substances, the resistance of the glove material cannot be calculated in advance and has therefore to be checked prior to the application.

- **Penetration time of glove material**

The exact break through time has to be found out by the manufacturer of the protective gloves and has to be observed.

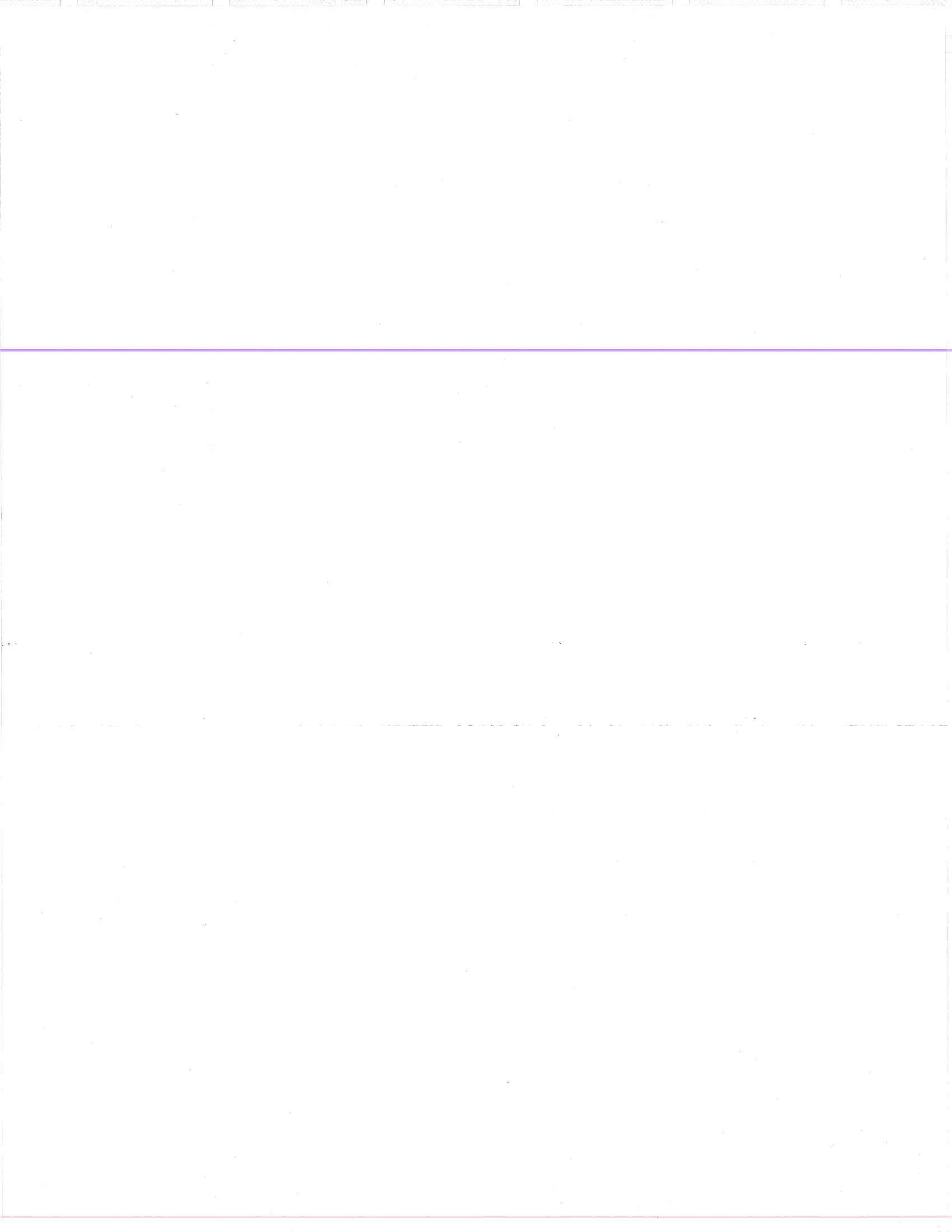
- **Eye protection:** Gauze goggles

- **Body protection:** Protective work clothing

- **Limitation and supervision of exposure into the environment** No special requirements.

- **Risk management measures** No special requirements.

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## 9 Physical and chemical properties

### 9.1 Information on basic physical and chemical properties

#### General Information

#### Appearance:

Form:	Solution
Colour:	Clear
Odour:	Mild
Odour threshold:	Not determined.

pH-value at 20 °C:	6,5-7,5
--------------------	---------

#### Change in condition

Melting point/Melting range:	Undetermined.
Boiling point/Boiling range:	100 °C (212 °F)

Flash point:	Not applicable.
--------------	-----------------

Flammability (solid, gaseous):	Not applicable.
--------------------------------	-----------------

Ignition temperature:	Not determined.
-----------------------	-----------------

Decomposition temperature:	Not determined.
----------------------------	-----------------

Self-igniting:	Product is not self-igniting.
----------------	-------------------------------

Danger of explosion:	Product does not present an explosion hazard.
----------------------	---

#### Explosion limits:

Lower:	Not determined.
Upper:	Not determined.

Vapour pressure at 20 °C:	23 hPa
---------------------------	--------

Density at 20 °C:	1.03 g/cm <sup>3</sup>
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Relative density	Not determined.
------------------	-----------------

Vapour density	Not determined.
----------------	-----------------

Evaporation rate	Not determined.
------------------	-----------------

#### Solubility in / Miscibility with water:

Soluble.

Partition coefficient (n-octanol/water):	Not determined.
--	-----------------

#### Viscosity:

Dynamic:	Not determined.
Kinematic:	Not determined.

#### Solvent content:

Organic solvents:	0.0 %
VOC (EC)	620 g/l

9.2 Other information	No further relevant information available.
-----------------------	--

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## 10 Stability and reactivity

- **10.1 Reactivity**
- **10.2 Chemical stability**
- **Thermal decomposition / conditions to be avoided:**  
No decomposition if used and stored according to specifications.
- **10.3 Possibility of hazardous reactions** Reacts with strong oxidizing agents.
- **10.4 Conditions to avoid** No further relevant information available.
- **10.5 Incompatible materials:** No further relevant information available.
- **10.6 Hazardous decomposition products:** Carbon monoxide and carbon dioxide

## 11 Toxicological information

- **11.1 Information on toxicological effects**
- **Acute toxicity:**
- **Primary irritant effect:**
  - **on the skin:** No irritant effect.
  - **on the eye:** Slight irritant effect on eyes.
- **Sensitization:** No sensitizing effects known.
- **Additional toxicological information:**  
The product is not subject to classification according to the calculation method of the General EU Classification Guidelines for Preparations as issued in the latest version.  
When used and handled according to specifications, the product does not have any harmful effects to our experience and the information provided to us.

## 12 Ecological information

- **12.1 Toxicity**
- **Aquatic toxicity:** No further relevant information available.
- **12.2 Persistence and degradability:** No further relevant information available.
- **12.3 Bioaccumulative potential:** No further relevant information available.
- **12.4 Mobility in soil:** No further relevant information available.
- **Additional ecological information:**
- **General notes:**  
Water hazard class 1 (German Regulation) (Self-assessment): slightly hazardous for water  
Do not allow undiluted product or large quantities of it to reach ground water, water course or sewage system.
- **12.5 Results of PBT and vPvB assessment**
- **PBT:** Not applicable.
- **vPvB:** Not applicable.
- **12.6 Other adverse effects** No further relevant information available.

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### 13 Disposal considerations

- **13.1 Waste treatment methods**
- **Recommendation:** Smaller quantities can be disposed of with household waste.
- **Uncleaned packaging:**
- **Recommendation:** Disposal must be made according to official regulations.
- **Recommended cleansing agents:** Water, if necessary together with cleansing agents.

### 14 Transport information

- |   |                 |
|---|-----------------|
| · <b>14.1 UN-Number</b>   |                 |
| · DOT, ADR, ADN, IMDG, IATA   | N/A             |
| · <b>14.2 UN proper shipping name</b>   |                 |
| · DOT, ADR, ADN, IMDG, IATA   | N/A             |
| · <b>14.3 Transport hazard class(es)</b>  |                 |
| · DOT, ADR, ADN, IMDG, IATA   |                 |
| · Class   | N/A             |
| · <b>14.4 Packing group</b>   |                 |
| · DOT, ADR, IMDG, IATA  | N/A             |
| · <b>14.5 Environmental hazards:</b>  |                 |
| · Marine pollutant:   | No              |
| · <b>14.6 Special precautions for user</b>  | Not applicable. |
| · <b>14.7 Transport in bulk according to Annex II of MARPOL73/78 and the IBC Code</b> | Not applicable. |
| · <b>UN "Model Regulation":</b>   | -               |

### 15 Regulatory information

- **15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture**
- **United States (USA)**
- **SARA**

· **Section 355 (extremely hazardous substances):**

None of the ingredients is listed.

· **Section 313 (Specific toxic chemical listings):**

None of the ingredients is listed.

· **TSCA (Toxic Substances Control Act):**

All ingredients are listed.

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· **Proposition 65 (California):**

· **Chemicals known to cause cancer:**

None of the ingredients is listed.

· **Chemicals known to cause reproductive toxicity for females:**

None of the ingredients is listed.

· **Chemicals known to cause reproductive toxicity for males:**

None of the ingredients is listed.

· **Chemicals known to cause developmental toxicity:**

None of the ingredients is listed.

· **Carcinogenic Categories**

· **EPA (Environmental Protection Agency)**

None of the ingredients is listed.

· **IARC (International Agency for Research on Cancer)**

None of the ingredients is listed.

· **TLV (Threshold Limit Value established by ACGIH)**

None of the ingredients is listed.

· **NIOSH-Ca (National Institute for Occupational Safety and Health)**

None of the ingredients is listed.

· **OSHA-Ca (Occupational Safety & Health Administration)**

None of the ingredients is listed.

· **Canada**

· **Canadian Domestic Substances List (DSL)**

All ingredients are listed.

· **Canadian Ingredient Disclosure list (limit 0.1%)**

None of the ingredients is listed.

· **Canadian Ingredient Disclosure list (limit 1%)**

None of the ingredients is listed.

· **15.2 Chemical safety assessment:** A Chemical Safety Assessment has not been carried out.

**16 Other information**

This information is based on our present knowledge. However, this shall not constitute a guarantee for any specific product features and shall not establish a legally valid contractual relationship.

· **Abbreviations and Acronyms:**

ADR: Accord européen sur le transport des marchandises dangereuses par Route (European Agreement concerning the International Carriage of Dangerous Goods by Road)

IMDG: International Maritime Code for Dangerous Goods

DOT: US Department of Transportation

IATA: International Air Transport Association

GHS: Globally Harmonized System of Classification and Labelling of Chemicals

ACGIH: American Conference of Governmental Industrial Hygienists

NFPA: National Fire Protection Association (USA)

HMIS: Hazardous Materials Identification System (USA)

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WHMIS: Workplace Hazardous Materials Information System (Canada)  
DNEL: Derived No-Effect Level (REACH)  
PNEC: Predicted No-Effect Concentration (REACH)

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